



United States Attorney
Southern District of New York

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August 29, 2019

BY EMAIL

The Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007
buchwaldnysdchambers@nysd.uscourts.gov

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007
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Re: *United States v. Janell Thompson, S3 18 Cr. 444 (NRB)*

United States v. Janell Thompson , 19 Cr. 614 (SHS)

Dear Judge Buchwald and Judge Stein:

The Government respectfully submits this letter regarding two cases pending before Your Honors.

On August 9, 2019, Janell Thompson (the “defendant”) accepted and executed a plea offer extended by the United States Attorney’s Office for the Southern District of New York (“USAO-SDNY”), in coordination with the United States Attorney’s Office for the Eastern District of North Carolina (“USAO-EDNC”), to waive indictment and plead guilty in the Southern District of New York to (1) an information charging a violation of 21 U.S.C. § 846 with docket number S3 18 Cr. 444 (NRB), to be filed in the Southern District of New York (the “SDNY Information”) and (2) an information charging a violation of 18 U.S.C. § 1956(h), to be filed in the Eastern District of North Carolina (the “EDNC Information”) and transferred to the Southern District of New York pursuant to Rule 20 of the Federal Rules of Criminal Procedure. A copy of the fully executed plea agreement (the “Plea Agreement”) is attached as Exhibit 1.

On August 23, 2019, the United States Attorney’s Office for the Eastern District of North Carolina (“USAO-EDNC”) filed the EDNC Information, which charged the defendant with one count of conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h), from on or about February 10, 2014, until in or about June 2018. A copy of the EDNC Information is attached as Exhibit 2. The case was assigned to the Honorable James C. Dever, III, United States District Judge for the Eastern District of North Carolina. The USAO-EDNC then filed a motion pursuant to Rule 20 of the Federal Rules of Criminal Procedure to transfer the case to the Southern District

of New York. The case was transferred from the Eastern District of North Carolina to the Southern District of New York and assigned to the Honorable Sidney H. Stein, United States District Judge.

A waiver of indictment and plea hearing with respect to the SDNY Information presently is scheduled before the Honorable Naomi Reice Buchwald, United States District Judge, for September 5, 2019, at 3:00 p.m. A copy of the SDNY Information is attached as Exhibit 3.

The Government respectfully submits this letter to inform Your Honors that the EDNC Information in the case before Judge Stein arises from substantially similar facts as the SDNY Information to be filed next week in the case before Judge Buchwald. The USAO-SDNY and USAO-EDNC have coordinated these joint charging instruments with the defendant. The defendant intends to waive indictment and plead guilty in the Southern District of New York to both Informations pursuant to the Plea Agreement.

Respectfully submitted,

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